

Office of the Secretary
Federal Communications Commission
445 12th St., SW
Washington, DC 20554

WT Docket No. 96-86
Comments

To: The Commission

The Department of Public Safety, State of Arizona wants to advise the FCC of concerns about its proposal.

There are three major issues that are not in the best interest of Public Safety these issues are:

- 1.) SAM (Scalable Advanced Modulation) architecture should not be accepted by the FCC as a standard. SAM architecture is proprietary to one vendor that has at least seven (7) intellectual property rights. Use of proprietary technologies does not promote competition that is in the best interest of Public Safety. SAM is not available as of yet and there is no date as to when this architecture will be available. It would not be in the best interest of Public Safety for the FCC to propose proprietary technologies that are not even available at this time and would cause untold delays. SAM has not been tested nor proven for effectiveness and reliability in Public Safety applications.
- 2.) Interoperability standards need to be further developed. Interoperability standards should be based upon data interoperability and at what level agencies would or should be interoperable. In addition, security levels need to be considered and established. An excellent example of interoperability is the 4.9 GHz band and exclusive use by Public Safety Wi-Fi like operations with inexpensive wideband devices and enhanced mesh networking techniques.
- 3.) ACP (Adjacent Channel Protection) specifications should not be reduced. All manufacturers should comply with current FCC recommended specifications for the 700 MHz wideband channels. Relaxation of ACP specifications may cause interference problems similar to issues experienced in the 800 MHz band.

Thank you for considering our comments on this very critical Public Safety matter.

Submitted by
Department of Public Safety, State of Arizona

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